CONOCO INCORPORATED

DENVER REFINERY - ASPHALT PLANT

JULY 8, 1980

SPCC PLAN

(Prior to completing Part I, refer to ... ulations and instructions page 5.)

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN

PART I
GENERAL INFORMATION

1. Name of facility Conoco Incorporated - Denver Refinery - Asphalt Plant

2. Type of facility Petroleum Refinery

3. Location of facility 5801 Brighton Boulevard
   Commerce City, Colorado 80022

4. Name and address of owner or operator:

   Name Conoco Incorporated

   Address 5801 Brighton Boulevard
   Commerce City, Colorado 80022

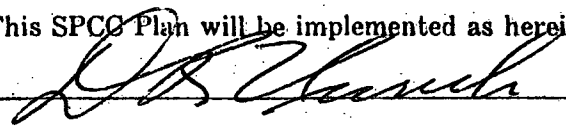
5. Designated person accountable for oil spill prevention at facility:

   Name and title Eldon W. Carpenter, Chief Refinery Chemist

6. Facility experienced a reportable oil spill event during the twelve months prior to Jan. 10, 1974 (effective date of 40 CFR, Part 112). (If YES, complete Attachment #1.) _____

MANAGEMENT APPROVAL

This SPCC Plan will be implemented as herein described.

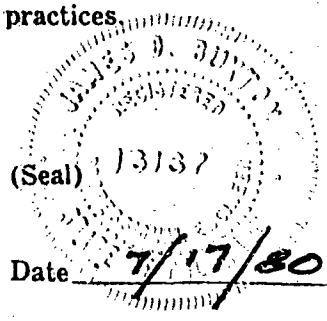
Signature 

Name D. R. Unruh

Title Denver Refinery Manager

CERTIFICATION

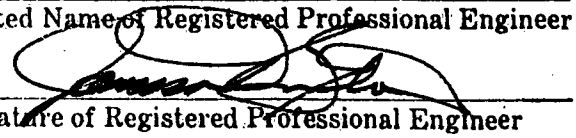
I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.



(Seal)

Date 7/17/80

James D. Buxton
Printed Name of Registered Professional Engineer



Signature of Registered Professional Engineer

Registration No. 13167 State Colorado

7. Potential Spills — Prediction & Control:

	Source	Major Type of Failure	Total Quantity (bbls)	Rate (bbls/hr)	Direction of Flow*	Secondary Containment
1.	Process equipment or vessel failure		Several hundred barrels		Into sewers or west-northwest	Earthen dike
2.	Storage tank	Tank Leakage	up to 80,000 barrels		Around tank	Earthen dike
3.	Loading Rack	Equipment or line failure			East-Northeast	Earthen dike
4.	Transfer lines	Rupture or leakage			Northerly	Earthen dike
5.	Oil trap	Overflow			Northerly	Earthen dike

Discussion:

Drainage from refinery is generally to the north. Earthen dikes have been constructed for secondary containment.

*Attach map if appropriate.

Name of facility Conoco Inc. - Denver Refinery - Asphalt Plant

Operator Conoco Inc.

[Response to statements should be: YES, NO, or NA (Not Applicable).]

8. Containment or diversionary structures or equipment to prevent oil from reaching navigable waters are practicable. (If NO, complete Attachment #2.) Yes

9. **Inspections and Records**
   A. The required inspections follow written procedures. Yes
   B. The written procedures and a record of inspections, signed by the appropriate supervisor or inspector, are attached. Yes
   Discussion: See letter attached.

10. **Personnel, Training, and Spill Prevention Procedures**
   A. Personnel are properly instructed in the following:
   (1) operation and maintenance of equipment to prevent oil discharges, and Yes
   (2) applicable pollution control laws, rules, and regulations. Yes
   Describe procedures employed for instruction:

   As part of the overall refinery training, each person who might or could be involved in oil spill prevention will be subjected annually to a lecture covering their responsibility in this area, as well as defining the pollution laws, rules, and regulations.

   B. Scheduled prevention briefings for the operating personnel are conducted frequently enough to assure adequate understanding of the SPCC Plan. Yes
   Describe briefing program:

   Along with the above training, the SPCC plan will be described and opened for discussion and questions.

Name of facility Conoco Inc. - Denver Refinery - Asphalt Plant

Operator Conoco Inc.

(Prior to completing Part II, Alternate A, refer to regulations and instructions pages 6-7.)

PART II, ALTERNATE A
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY (EXCLUDING PRODUCTION)

A. Facility Drainage

1. Drainage from diked storage areas is controlled as follows (include operating description of valves, pumps, ejectors, etc. *(Note: Flapper-type valves should not be used)*:

Drainage from diked storage area flows into a locked, fenced, concrete drainage pit with gate valve. Normally any oil will be removed by a vacuum truck and water will be allowed to evaporate. Gate valve will be opened only with the approval of the Chief Refinery Chemist, except in case of emergency. Open valve will not be left unattended and records of drainage will be maintained.

2. Drainage from undiked areas is controlled as follows (include description of ponds, lagoons, or catchment basins and methods of retaining and returning oil to facility):

Runoff is into sewers which are tied into the oil trap. Oil is skimmed and returned from the traps.

3. The procedure for supervising the drainage of rain water from secondary containment into a storm drain or an open watercourse is as follows (include description of (a) inspection for pollutants, and (b) method of valving security). (A record of inspection and drainage events is to be maintained on a form similar to Attachment #3):

The water is checked for visual oil and the pH, COD and oil and grease content of a representative sample is determined. Except in case of emergency, the water is drained during daylight hours only under the supervision of the Chief Refinery Chemist. Records of drainage are kept for 3 years. Valve is chained and locked shut.

Name of facility Conoco Inc. - Denver Refinery - Asphalt Plant

Operator Conoco Inc.

PART II, ALTERNATE A
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY (EXCLUDING PRODUCTION)

[Response to statements should be: YES, NO, or NA (Not Applicable).]

B. Bulk Storage Tanks

1. Describe tank design, materials of construction, fail-safe engineering features, and if needed, corrosion protection:

Tanks are horizontal or vertical cylindrical constructed of steel, maximum stress 21,000 psi, are equipped with vents, relief valves or pressure/vacuum relief valves as required by operating conditions.

2. Describe secondary containment design, construction materials, and volume:

Earthen dikes encompass tankage. The volume of dikes meet NFPA code #30 and also Continental Oil Company Engineering Standards.

3. Describe tank inspection methods, procedures, and record keeping:

Storage tanks are visually inspected daily for signs of leakage. Tanks are periodically inspected by non-destructive testing (ultrasonic) to determine metal thickness. Record of last inspection is on file.

4. Internal heating coil leakage is controlled by one or more of the following control factors:
   (a) Monitoring the steam return or exhaust lines for oil. No
   Describe monitoring procedure:
   (b) Passing the steam return or exhaust lines through a settling tank, skimmer, or other separation system. Yes
   (c) Installing external heating systems. Yes

5. Disposal facilities for plant effluents discharged into navigable waters are observed frequently for indication of possible upsets which may cause an oil spill event. NA
   Describe method and frequency of observations:

No effluent is discharged from this facility into navigable waters. All effluent water is pumped to main plant for disposal.

Name of facility Conoco Inc. - Denver Refinery - Asphalt Plant

Operator Conoco Inc.

PART II, ALTERNATE A
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY (EXCLUDING PRODUCTION)

[Response to statements should be: YES, NO, or NA (Not Applicable).]

C. Facility Transfer Operations, Pumping, and In-plant Process

1. Corrosion protection for buried pipelines:
   (a) Pipelines are wrapped and coated to reduce corrosion. Some
   (b) Cathodic protection is provided for pipelines if determined necessary by electrolytic testing. No
   (c) When a pipeline section is exposed, it is examined and corrective action taken as necessary. Yes

2. Pipeline terminal connections are capped or blank-flanged and marked if the pipeline is not in service or on standby service for extended periods. Yes
   Describe criteria for determining when to cap or blank-flange:
   If there is a possibility of oil pressure getting to the open end.

3. Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction.
   Describe pipe support design:
   Pipe supports are constructed of appropriate steel shapes. Design and spacing limit stress to safety factor of 4. In operating areas pipe supports are fireproofed to provide three hours fire resistance rating.

4. Describe procedures for regularly examining all above-ground valves and pipelines (including flange joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces):
   Manpower on all equipment is maintained on a 24-hour basis daily; therefore part of their responsibility is to constantly be alert for any oil leakage at any point in the refinery.

5. Describe procedures for warning vehicles entering the facility to avoid damaging above-ground piping:
   Signs are posted at entrance gates warning of overhead pipeline.

Name of facility Conoco Inc. - Denver Refinery - Asphalt Plant

Operator Conoco Inc.

PART II, ALTERNATE A
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY (EXCLUDING PRODUCTION)

[Response to statements should be: YES, NO, or NA (Not Applicable).]

D. Facility Tank Car & Tank Truck Loading/Unloading Rack

Tank car and tank truck loading/unloading occurs at the facility. (If YES, complete 1 through 5 below.) Yes

1. Loading/unloading procedures meet the minimum requirements and regulations of the Department of Transportation. Yes

2. The unloading area has a quick drainage system. NA

3. The containment system will hold the maximum capacity of any single compartment of a tank truck loaded/unloaded in the plant. Yes
   Describe containment system design, construction materials, and volume:
   Refinery perimeter diked.

4. An interlocked warning light, a physical barrier system, or warning signs are provided in loading/unloading areas to prevent vehicular departure before disconnect of transfer lines. Yes
   Describe methods, procedures, and/or equipment used to prevent premature vehicular departure:
   Warning signs are posted at each rack to remove all spouts before starting truck.

5. Drains and outlets on tank trucks and tank cars are checked for leakage before loading/unloading or departure. Yes

Name of facility Conoco Inc. - Denver Refinery - Asphalt Plant

Operator Conoco Inc.

PART II, ALTERNATE A
DESIGN AND OPERATING INFORMATION
ONSHORE FACILITY (EXCLUDING PRODUCTION)

[Response to statements should be: YES, NO, or NA (Not Applicable).]

E. Security

1. Plants handling, processing, or storing oil are fenced. Yes

2. Entrance gates are locked and/or guarded when the plant is unattended or not in production. Yes

3. Any valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or standby status. Yes

4. Starter controls on all oil pumps in non-operating or standby status are:
   (a) locked in the off position;
   (b) located at site accessible only to authorized personnel. Yes

5. Discussion of items 1 through 4 as appropriate:

Loading is done with company personnel who are on duty 24 hours a day. Non-company security guards are hired to patrol refinery routinely each night.

6. Discussion of the lighting around the facility:

Lighting for the entire refinery and operating facilities is adequate to meet all safety standards and allow surveillance of equipment and tankage.

Name of facility Conoco Inc. - Denver Refinery - Asphalt Plant

Operator Conoco Inc.

SPCC PLAN, ATTACHMENT #1
SPILL HISTORY

(Complete this form for any reportable spill(s) which has (have) occurred from this facility during the twelve months prior to January 10, 1974 into _____ navigable water.)

1. Date _____ Volume _____ Cause: _____

Corrective action taken: _____

Plans for preventing recurrence: _____

2. Date _____ Volume _____ Cause: _____

Corrective action taken: _____

Plans for preventing recurrence: _____

3. Date _____ Volume _____ Cause: _____

Corrective action taken: _____

Plans for preventing recurrence: _____

Name of facility Conoco Inc. - Denver Refinery - Asphalt Plant

Operator Conoco Inc.

SPCC PLAN, ATTACHMENT #2
OIL SPILL CONTINGENCY PLANS AND WRITTEN COMMITMENT OF MANPOWER

Secondary containment or diversionary structures are impracticable for this facility for the following reasons (attach additional pages if necessary):

	Yes
A strong oil spill contingency plan is attached.	_____
A written commitment of manpower is attached.	_____

Name of facility Conoco Inc. - Denver Refinery - Asphalt Plant

Operator Conoco Inc.

SPCC PLAN, ATTACHMENT #3
ONSHORE FACILITY BULK STORAGE TANKS
DRAINAGE SYSTEM

Inspection Procedure:

Record of drainage, bypassing, inspection, and oil removal from secondary containment:

Date of Drainage	Date of Bypassing Open	Date of Bypassing Closed	Date of Inspection	Oil Removal	Supervisor's or Inspector's Signature

Name of facility Conoco Inc. - Denver Refinery - Asphalt Plant

Operator Conoco Inc.

(Attachment #3, SPCC Plan)

TO: All Supervisor

FROM: D. R. Unruh

DATE: July 8, 1980

SUBJECT: Denver Refinery - **Asphalt Plant** - SPCC Plan Record of Inspection and Drainage from Diked Areas.

Drainage of rain water from dikes into a storm drain or into an effluent discharge which empties into an open watercourse, lake, or pond may bypass the in-plant treatment system if (a) the by-pass valve is normally sealed closed, (b) the effluent is inspected to ensure compliance with applicable water quality standards and that no harmful discharge will occur, (c) the opening and resealing of the bypass valve in conducted under responsible supervisor and (d) adequate records are kept of such events.

Normally any rain water discharge will be inspected by the laboratory before the seal on the bypass valve in broken under the supervisor of the Chief Refinery Chemist. In emergencies the seal may be broken and the bypass valve opened under responsible supervisor after a sample has been obtained for subsequent inspection.

Attachment #3 of this plan will be followed for these records which will be kept on file for minimum of three years.

D. R. Unruh

CC: All Supervisors

7/8/80

ASPHALT UNIT CALLOUT LIST

1.	R. Bradley	750-1492
2.	A. Smith	770-4995
3.	L. Heideman	659-1057
4.	J. Heyd	741-1298
5.	D. Wohlgenant	770-8378
6.	H. Reffel	429-6682
7.	D. Unruh	279-0471
8.	J. Buxton	423-1840
9.	D. Pfeif	451-7568
10.	I. Valdez	423-9195
11.	G. Giese	371-6720
12.	D. Dewitz	695-8260
13.	J. Betz	355-6750
14.	B. Roberts	466-8252
15.	H. Dunham	237-0793
16.	K. Skiles	457-1554
17.	W. McCoy	371-4125
18.	J. Petersen	761-6224
19.	J. Patrick	428-1662
20.	J. Wantulok	457-9883
21.	J. Smith	722-9382

R. Bradley or A. Smith will call J. Moss (750-4854). J. Moss will call R. T. Smith (429-7423) or L. Ridley (798-4791).

DISTRIBUTION CENTER

1.	Ed Kochevar	979-0357
2.	Howard Smith	756-1075
3.	Frank McCumber	733-2807

7-8-80

MAIN PLANT OPERATING UNIT CALLOUT LIST

1.	R. Bradley	750-1492
2.	A. Smith	770-4995
3.	J. Heyd	741-1298
4.	J. Buxton	423-1840
5.	L. Brandt	659-0318
6.	G. Lepard	320-8411
7.	F. Williamson	288-3530
8.	R. Valesquez	287-4750
9.	E. Rauschenberger	238-9162
10.	B. Starns	452-3536
11.	D. Unruh	279-0471
12.	D. Wohlgenant	770-8378
13.	M. Lyells	451-0458
14.	B. Watkins	422-0453
15.	D. Dewitz	695-8260
16.	J. Betz	355-6760
17.	E. Carpenter	466-8150
18.	B. Roberts	466-8252
19.	H. Dunham	237-0793
20.	K. Skiles	457-1554
21.	W. McCoy	371-4125
22.	J. Petersen	761-6224
23.	J. Patrick	428-1662
24.	J. Wantulok	457-9883
25.	J. Smith	722-9382
26.	D. Creamer	423-4092
27.	A. John	831-4294

R. Bradley or A. Smith will call J.W. Moss (750-4854).

J.W. Moss will call R.T. Smith (429-7423) or L. Ridley (798-4791).

PUMPING & LOADING CALLOUT LIST

1.	R. Bradley	750-1492
2.	A. Smith	770-4995
3.	F. Wyckoff	421-2503
4.	J. Heyd	741-1298
5.	D. Unruh	279-0471
6.	D. Wohlgenant	770-8378
7.	J. Buxton	423-1840
8.	G. Peet	424-2707
9.	W. Guyer	288-4074
10.	K. Beebe	322-9105
11.	D. Dewitz	695-8260
12.	J. Betz	355-6750
13.	B. Roberts	466-8252
14.	H. Dunham	237-0793
15.	K. Skiles	457-1554
16.	W. McCoy	371-4125
17.	J. Petersen	761-6224
18.	J. Patrick	428-1662
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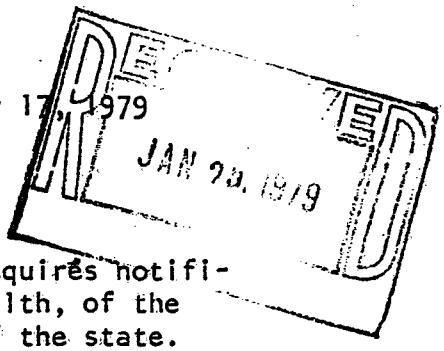
DISTRIBUTION CENTER

1.	Ed Kochevar	979-0359
2.	Howard Smith	756-1075
3.	Frank McCumber	733-2807

EWC

COLORADO DEPARTMENT OF HEALTH
Water Quality Control Division

January 17, 1979



SPILL REPORTING

Colorado State Law, 1973 (C. R. S. (1973) 25-8-601) in part requires notification to the Water Quality Control Division, Department of Health, of the spillage of any material which may cause pollution of waters of the state. This notification must be made by telephone as soon as is practicable. Failure to notify or delayed notification is punishable by a fine of up to $10,000.00 and/or by imprisonment for up to one year. In addition to reporting a spill, the company responsible should take immediate corrective action to contain and/or remove the substance spilled.

The Federal Water Quality Control Act Amendments of 1972, in part, states that any spill of an oil or hazardous material into navigable waters must be reported immediately to the appropriate federal agency. Failure to report the spill carries a fine of up to $10,000.00 and/or one year imprisonment. In addition, any spill of oil or a hazardous material to navigable waters shall be assessed a civil penalty by the Coast Guard in an amount not to exceed $5,000.00.

When a spill of any material occurs which does or may reach any water of the state, surface or groundwater, the spill must be reported immediately by telephone to the following, listed in order of preference:

1. Normal Duty Hours - 8:00 a.m.- 5:00 p.m.:

   Colorado Department of Health
   Denver, CO. - Telephone 320-8333, Ext. 3459
   or Ext. 3477

2. Non-duty Hours

   Roger Smades - 985-2735
   Fred Matter - 690-7462
   If unable to reach either one, call 320-1465

3. If spills are of radioactive hazardous material

   Call 320-1465
   Or Al Hazle - 422-4146 during non-duty hours.

4. U. S. Environmental Protection Agency
   Denver, CO.

   837-3880 (24-hour contact)

In the event you are unable to contact the State Water Quality Control Division or its personnel, notification of the U. S. Environmental Protection Agency will suffice.

SPILL REPORTING

NOTE: This supersedes some of the instructions in the Manual For Reporting Spills, dated January, 1975 and the Spill Reporting Sheet dated Dec.15, 1978.

ETB:bd